

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	No. <u>10-00025-01-CR-W-HFS</u>
)	
Plaintiff,)	18 U.S.C. § 2339B
)	(Material support to a terrorist organization)
v.)	
)	NMT 15 years
KHALID OUAZZANI,)	NMT \$250,000 fine
[DOB: 12/17/1977])	NMT 5 years supervised release
)	Class C Felony
Defendant.)	
)	\$100 Special Assessment

INFORMATION

The United States Attorney charges:

1. At all times material to this Information, Al-Qaida was (A) a “designated terrorist organization,” as that term is defined in 18 U.S.C. § 2339B(g)(6), that is, an organization that was first designated by the United States Secretary of State as a foreign terrorist organization on October 8, 1999, and has been redesignated as such on various dates; and (B) was an organization which had engaged in and engages in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act) and which had engaged in and engages in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

2. From at least in or about August 2007, up to and including in or about February 2010, at Kansas City in the Western District of Missouri, and elsewhere, defendant KHALID OUAZZANI (“OUAZZANI”), and others known and unknown, did knowingly conspire to provide “material support or resources,” as that term is defined in 18 U.S.C. § 2339A(b), to Al-Qaida, OUAZZANI and the co-conspirators knowing that Al-Qaida, was a designated terrorist organization and that Al-Qaida was an organization which had engaged in and was engaging in terrorist activity and terrorism;

and there is jurisdiction for this offense under 18 U.S.C. § 2339B(d)(1)(A),(D) and (E), in that defendant OUZZANI is a national of the United States (as defined in section 101(a)(22) of the Immigration and Nationality Act (8 U.S.C. § 1101(a)(22)); the offense occurred in whole or in part within the United States; and the offense occurred in and affected interstate or foreign commerce.

3. It was a part of the conspiracy that OUZZANI and co-conspirators would and did discuss various specific ways they could support Al-Qaida, including providing currency, advice and assistance to Al-Qaida, such assistance including fighting in Afghanistan, Iraq or Somalia at the request of Al-Qaida. In conducting these discussions, OUZZANI and co-conspirators, known and unknown to the United States, would and did use various methods and techniques to attempt to disguise their communications in order to avoid detection by law enforcement officials that they were providing various types of support to Al-Qaida.

4. It was a further part of the conspiracy that OUZZANI would and did personally provide over \$23,000 in United States currency for the use and benefit of Al-Qaida and would and did perform other tasks at the request of and for the benefit of Al-Qaida.

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, OUZZANI committed and caused to be committed the following overt acts, among others, in the Western District of Missouri and elsewhere:

a. In or about August, 2007, OUZZANI agreed to contribute approximately \$6,500 to Al-Qaida through a co-conspirator and caused the co-conspirator to pay such funds to Al-Qaida on behalf of OUZZANI;

b. In or about November, 2007, OUZZANI repaid the co-conspirator for the \$6,500 funds previously sent to Al-Qaida through a wire transfer of funds from an account of

OUAZZANI's at Bank of America, Kansas City, Missouri, to an account of the co-conspirator in United Arab Emirates.

c. In or about June or July, 2008, OUAZZANI agreed to pay Al-Qaida a total of \$17,000, representing his profits from the sale of real property in United Arab Emirates, owned by OUAZZANI and a co-conspirator, and instructed the co-conspirator to make such payment to Al-Qaida on OUAZZANI'S behalf.

d. In or about June, 2008, OUAZZANI swore an oath of allegiance to Al-Qaida through a co-conspirator.

All in violation of Title 18, United States Code, Sections 2339B(a)(1), (d)(1)(A), (d)(1)(D), and (d)(1)(E).

Beth Phillips
United States Attorney

By /s/ J. Daniel Stewart
J. Daniel Stewart
Assistant U.S. Attorney

By /s/ David M. Ketchmark
David M. Ketchmark
First Assistant U.S. Attorney

By /s/ Brian P. Casey
Brian P. Casey
Assistant U.S. Attorney

By /s/ M. Alexander Menzel, Jr.
M. Alexander Menzel, Jr.
Special Assistant U.S. Attorney

Dated: May 19, 2010
Kansas City, Missouri